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September 11, 2002

Ms Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: WT Docket No. 94-102

Dear Ms Dortch:

This is to inform you that on September 10, 2002, Richard Sbaratta, Kelly Boggs and I met with the following members of the Wireless Telecommunications Bureau: Barry Ohlson, Chief of the Wireless Telecommunications Bureau's Policy Division, Blaise Scinto, Senior Deputy Chief of that Division, Daniel Grosh; Jennifer Salhus; Jane Phillips, Martin Liebman and Patrick Forster. Christopher Barnekov of the Wireline Competition Bureau also attended the meeting.

During the meeting Ms. Boggs presented an overview of BellSouth's network architecture for both wireline and wireless E911. Attached is a copy of the presentation Ms. Boggs used during this part of the discussion. Using the diagrams presented in the overview, Ms Boggs explained why BellSouth believes that its allocation among wireless carriers, the operators of Mobile Position Centers, and Public Safety Answering Points, or PSAPS, of costs associated with upgrading BellSouth's network facilities to be able to move to Phase II wireless E911 service is consistent with Commission precedent. In particular we explained why BellSouth had concluded that the costs of upgrading our network to enable wireless carriers to deliver the latitude and longitude of a wireless 911 caller's location to the correct PSAP certain costs should be recovered from those carriers.

We also discussed the nature of the costs that BellSouth would be recovering through charges levied on wireless carriers, PSAPs and the MPC operators and the magnitude and frequency with which these charges would be levied. We

explained why BellSouth had concluded that certain costs should be recovered from wireless carriers through recurring "per dip" charges rather than a non-recurring charge and other costs should be recovered from MPC operators through flat non-recurring and recurring charges. Finally we discussed whether there were legal barriers to BellSouth providing PSAPs with information beyond the information required under Phase II.

In accordance with Section 1.1206, I am filing two copies of this and request that you place it in the record of the proceeding identified above. Thank you.

Sincerely,

A handwritten signature in black ink, reading "Kathleen B. Levitz". The signature is written in a cursive, flowing style.

Kathleen B. Levitz

Attachment

cc: Barry Ohlson  
Blaise Scinto  
Christopher Barnekov  
Daniel Grosh  
Jane Phillips,  
Martin Liebman  
Jennifer Salhus  
Patrick Forster

# BellSouth E911 Architecture Overview

September 10, 2002

# Traditional Wireline E911 Network Flow

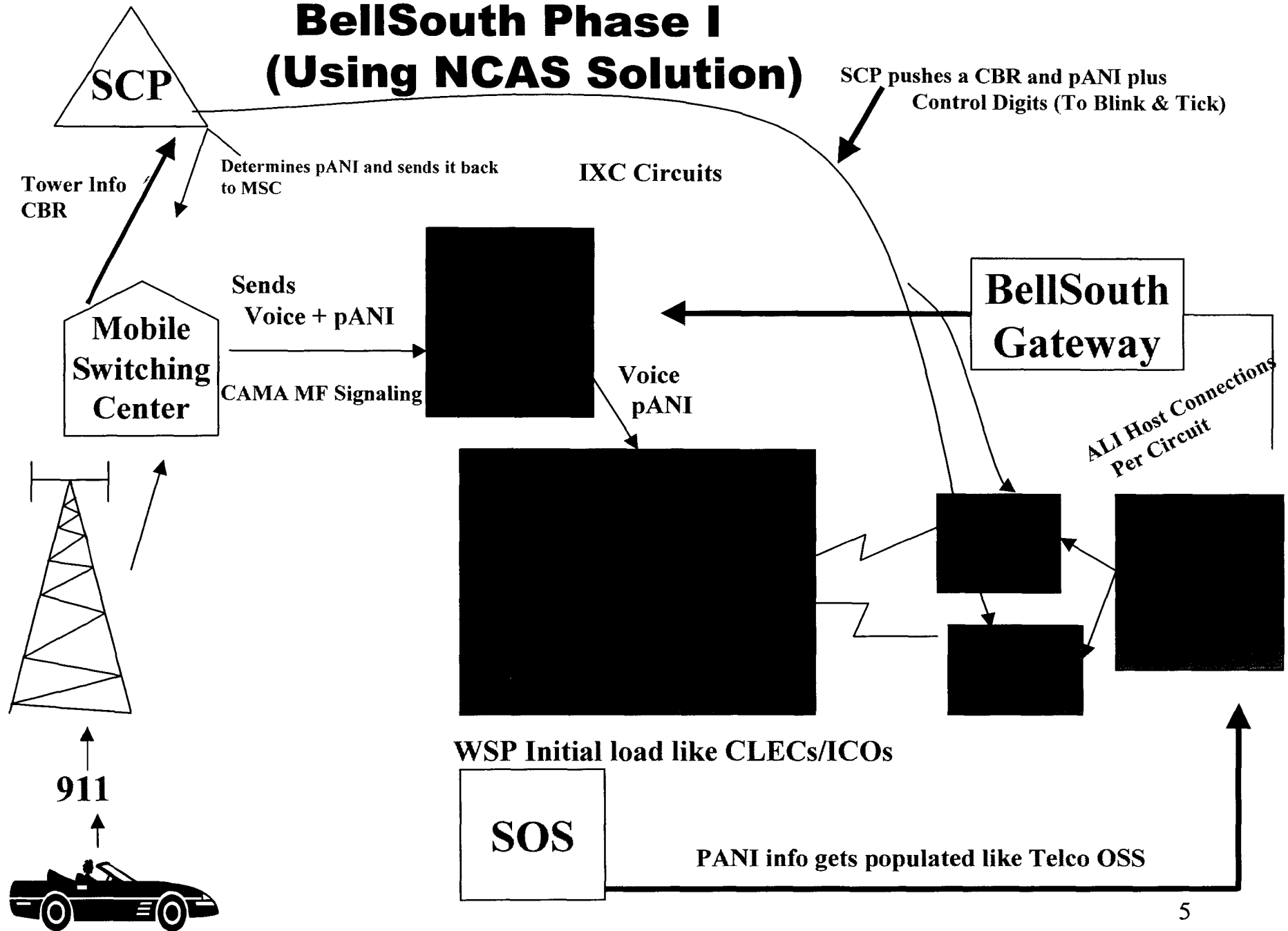
The diagram illustrates the flow of a 911 call through various system components:

- Caller:** Represented by a person icon on the left, initiating the call.
- Trunking Dedicated To 911:** A large rectangular block at the top center that receives the initial call signal.
- VOICE/PANI:** An arrow labeled "VOICE/PANI" points from the caller to the "Trunking Dedicated To 911" block.
- ALI BIDS:** A large rectangular block in the center that receives input from the "Trunking Dedicated To 911" block. It has two dashed arrows labeled "ALI BIDS" pointing to two smaller rectangular blocks on the right.
- ALI BIDS Blocks:** Two smaller rectangular blocks on the right that receive "ALI BIDS" information from the central "ALI BIDS" block.
- Extract 911 Relevant Information:** A large rectangular block on the far right that receives input from the "ALI BIDS" blocks and the "Trunking Dedicated To 911" block. It has an arrow pointing to a small rectangular block at the bottom left.
- Trunking Dedicated To 911:** A large rectangular block at the top center that receives input from the "Extract 911 Relevant Information" block and the "Trunking Dedicated To 911" block.

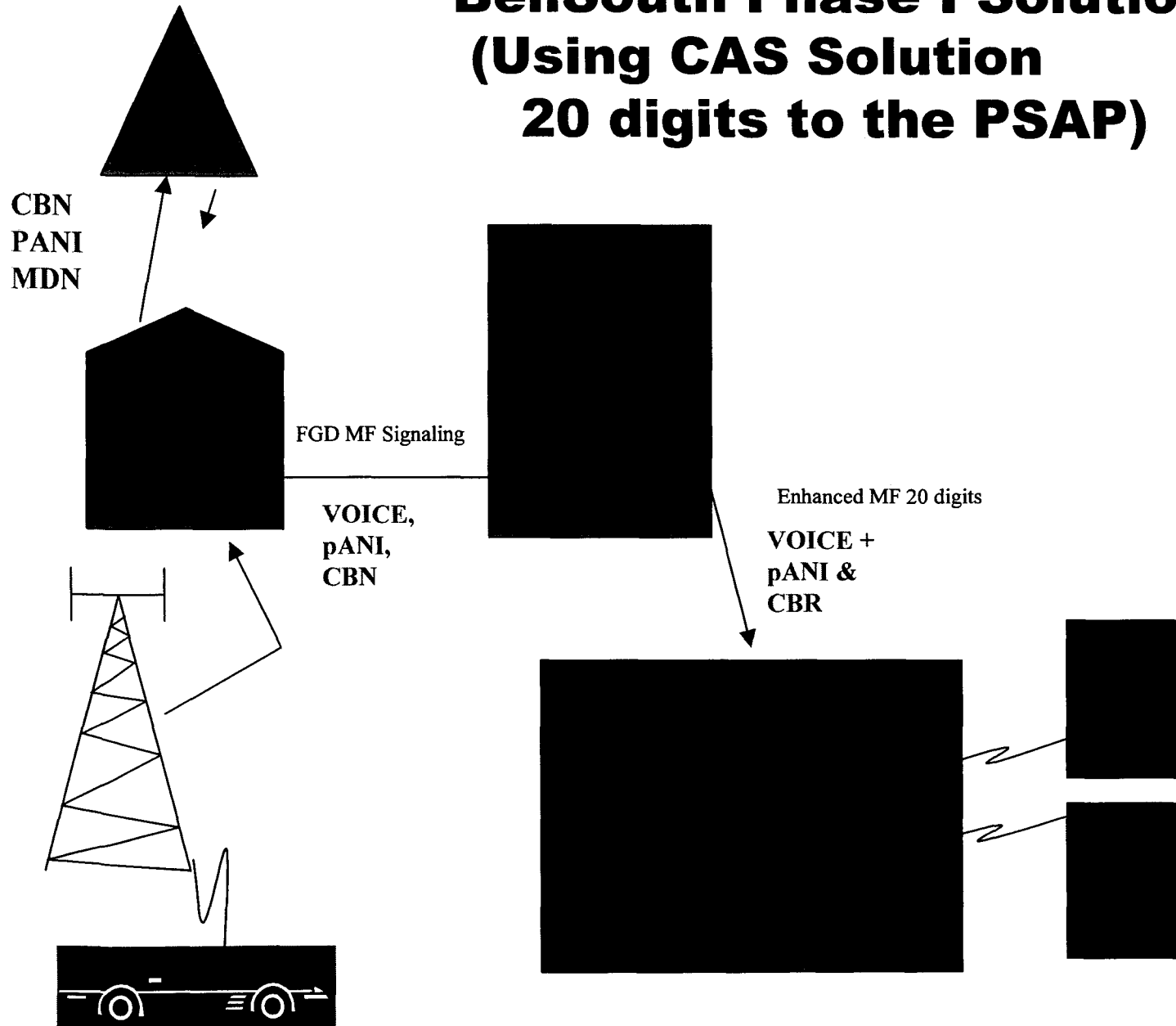
# Phase I

## Wireless E911 Network

# BellSouth Phase I (Using NCAS Solution)

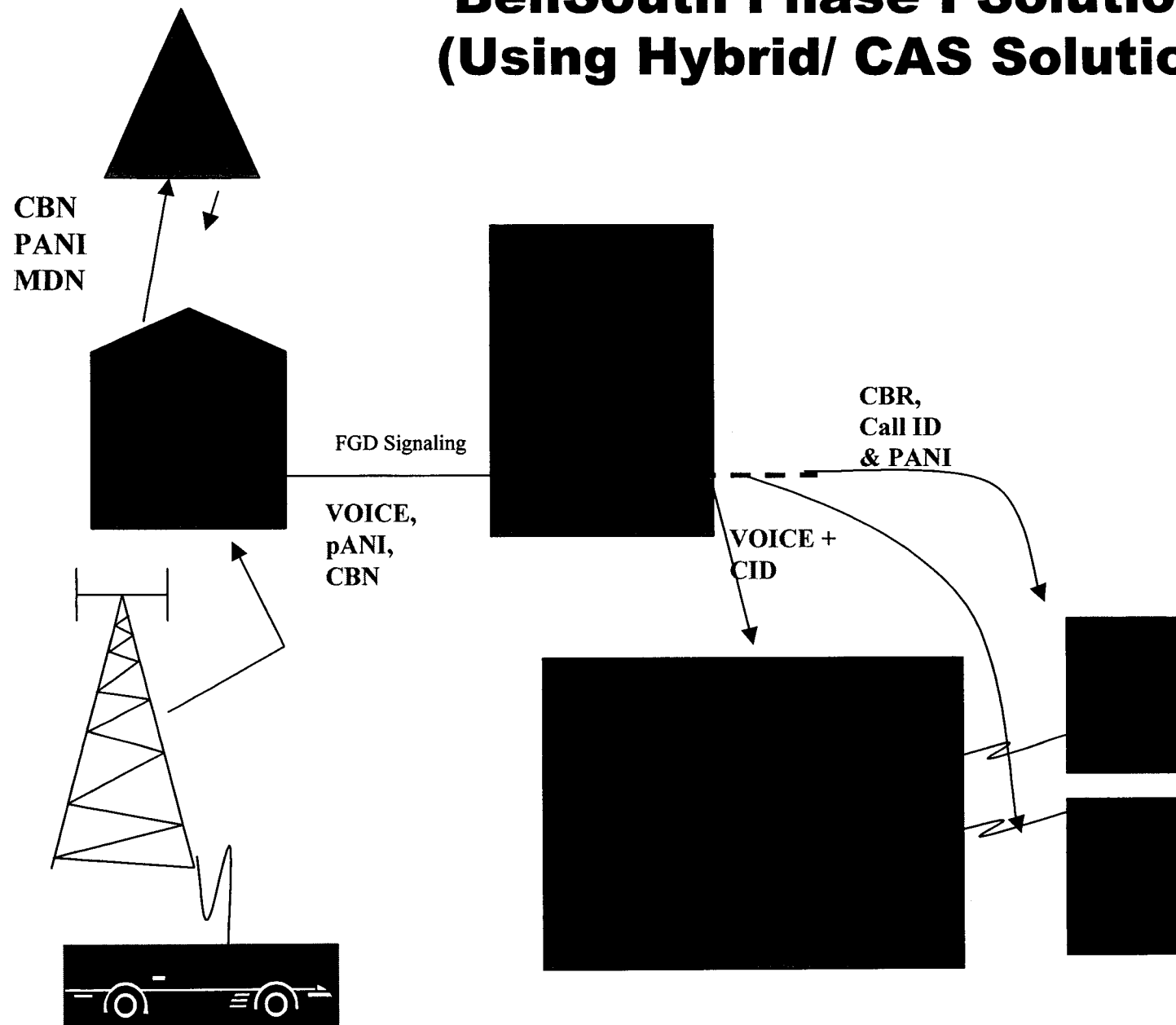


# **BellSouth Phase I Solution (Using CAS Solution 20 digits to the PSAP)**



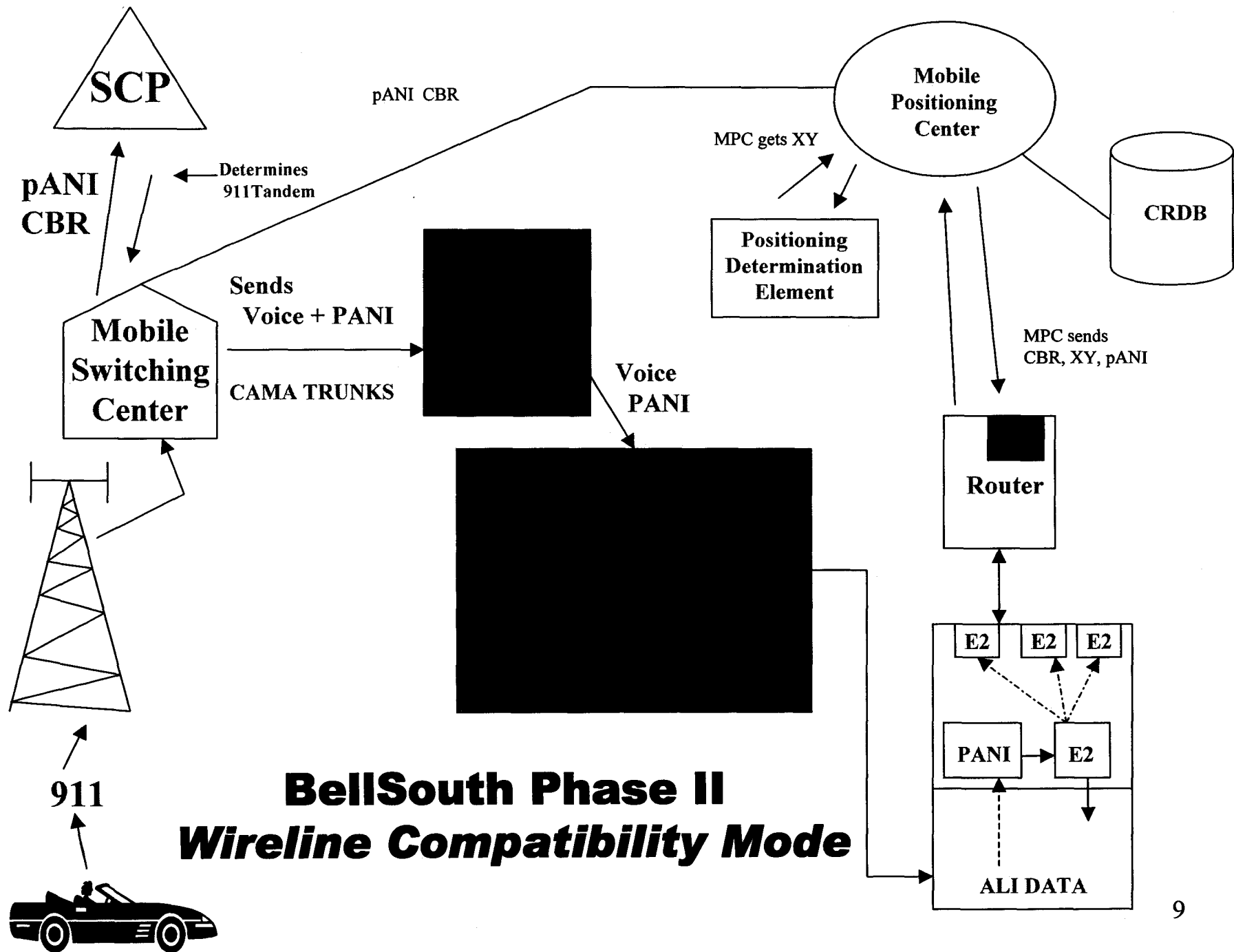


# BellSouth Phase I Solution (Using Hybrid/ CAS Solution)

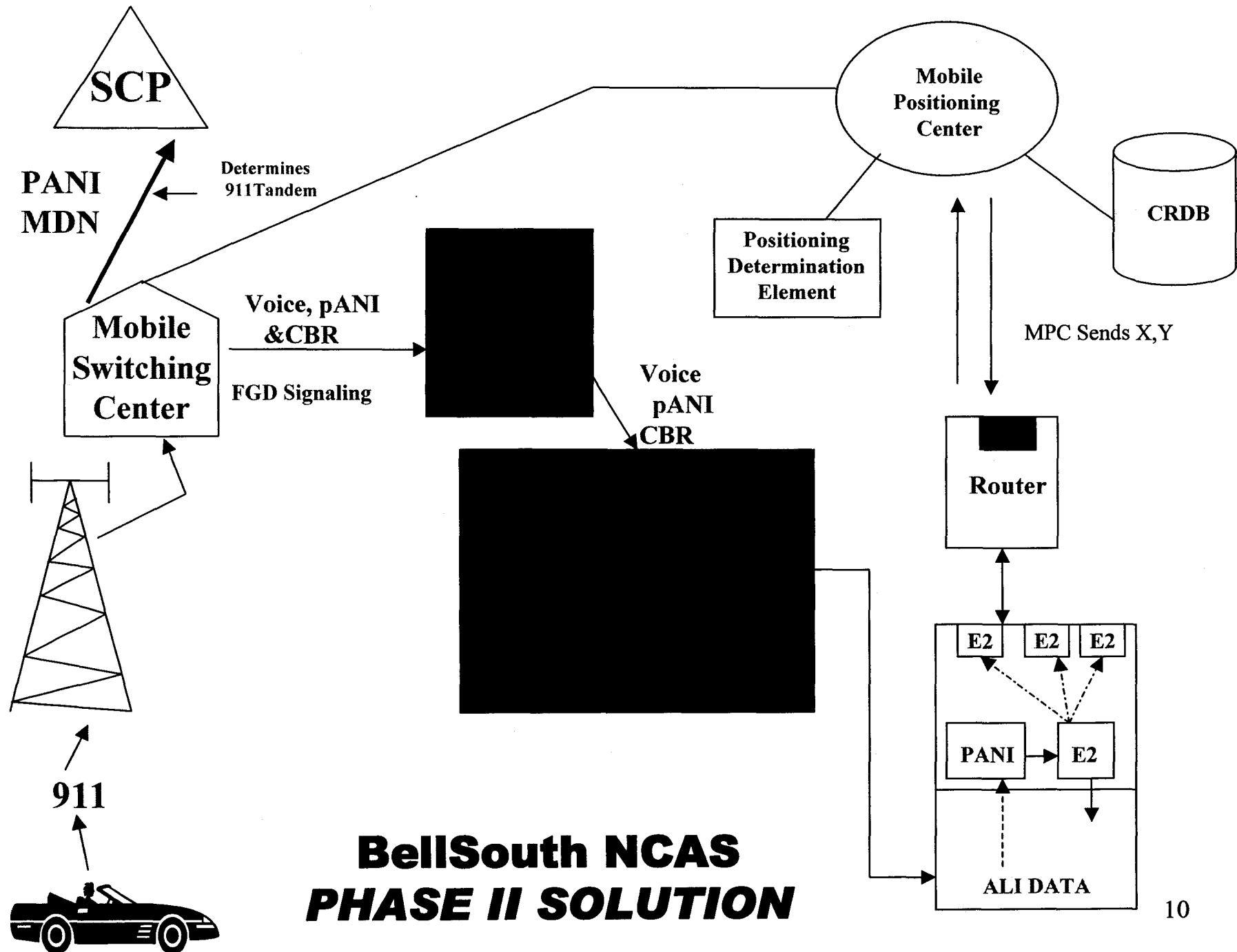


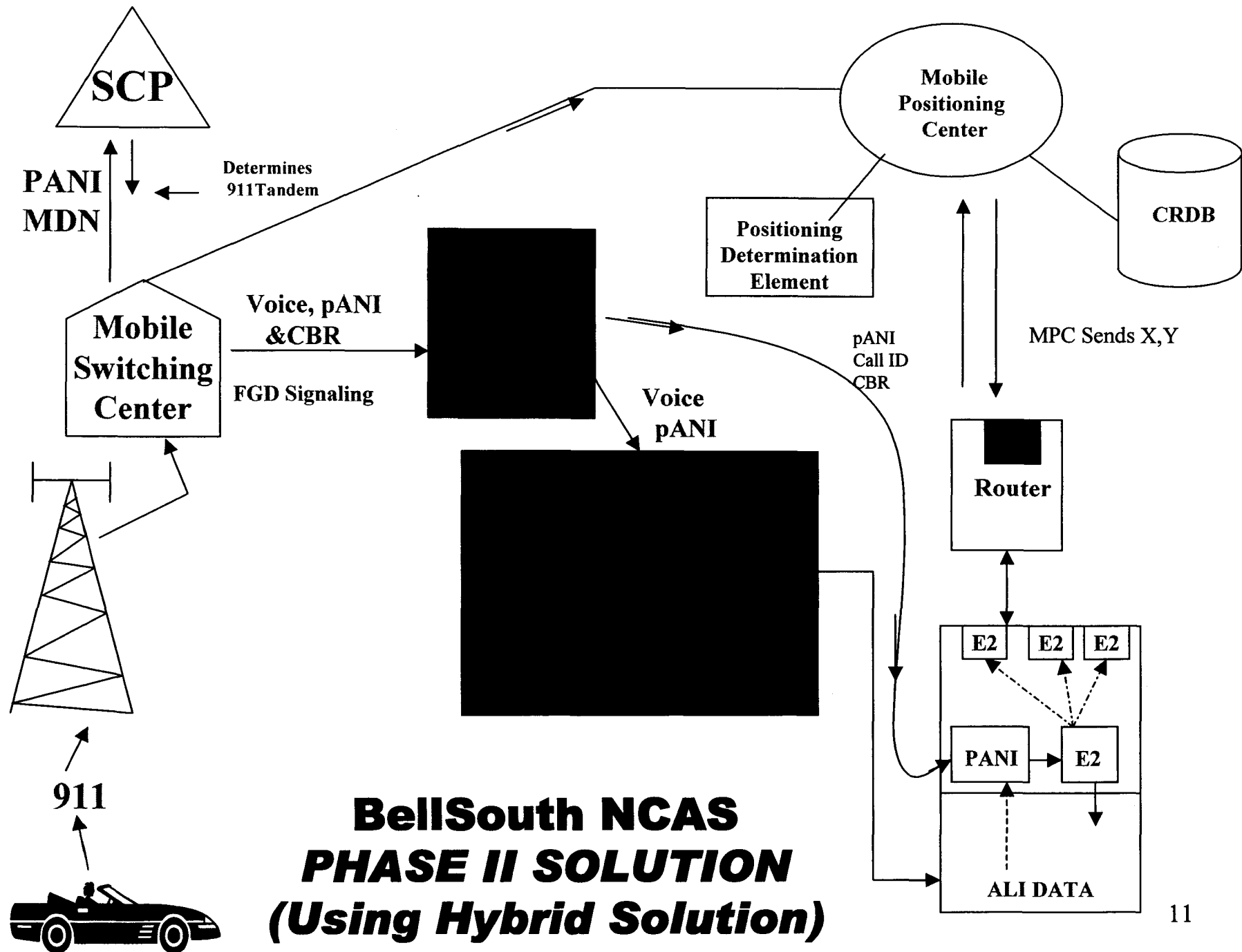
# Phase II

## Wireless E911 Network



## BellSouth Phase II Wireline Compatibility Mode





**BellSouth NCAS  
PHASE II SOLUTION  
(Using Hybrid Solution)**